U.S. Department of Justice



JRS/ALK/KRA F. #2020R00146 United States Attorney Eastern District of New York

271 Cadman Plaza East Brooklyn, New York 11201

March 24, 2025

By ECF

The Honorable LaShann DeArcy Hall United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

> Re: United States v. Saracay Lopez, <u>et al.</u> Criminal Docket No. 20-228 (S-3) (LDH)

Dear Judge DeArcy Hall:

The government respectfully submits this letter on behalf of itself and the defendants Carlos Alvarado, Erick Galdamez Leon, Jose Mejia Hernandez, and Erick Zavala Hernandez, pursuant to the Court's March 14, 2025 order directing the parties to file a joint proposed briefing schedule no later than March 21, 2025. The government apologizes for inadvertently failing to meet that deadline.

Trial for these defendants is scheduled to begin on January 26, 2026. As the Court is aware, a trial is also scheduled for five defendants on the same indictment to begin on October 14, 2025 and to continue at least through November 2025. Because the Court may have limited availability during the pendency of the first trial, the government proposes the following briefing schedule:

Pretrial Motions (including any anonymous jury motion)

Opening Briefs: August 1, 2025

• Opposition: August 29, 2025

• Reply: September 5, 2025

Motions in Limine

• Opening briefs: November 10, 2025

• Opposition: December 1, 2025

The defendants join in the proposed schedule for motions in limine but request a later schedule for pretrial motions, specifically:

• Opening Briefs: September 1, 2025

• Opposition: September 29, 2025

• Reply: October 6, 2025

The government provided a draft of this letter to counsel for the defendants on March 20, 2025, and no counsel has objected to its contents.

Respectfully submitted,

JOHN J. DURHAM United States Attorney

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cc: Clerk of Court (LDH) (via ECF)
Counsel of Record (via ECF)